

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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:
In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (SCC)**
:
Debtors. : **(Jointly Administered)**
:
-----X

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

CAROL ZHANG, being duly sworn, deposes and says:

1. I am employed as a Noticing Coordinator by Epiq Bankruptcy Solutions, LLC, located at 757 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On February 26, 2014, I caused to be served a *Letter from Ralph I. Miller of Weil, Gotshal & Manges to The Honorable Shelley C. Chapman, regarding certain omnibus objections to claims relating to Restricted Stock Units and Contingent Stock Awards*, dated February 25, 2014, annexed hereto as Exhibit A, by causing true and correct copies to be:
 - i. delivered via electronic mail to those parties listed on the annexed Exhibit B, and
 - ii. enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit C.
3. All envelopes utilized in the service of the foregoing contained the following legend:
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

Sworn to before me this
27th day of February, 2014
/s/ Cassandra Murray

Notary Public, State of New York
No. 01MU6220179
Qualified in Queens County
Commission Expires April 12, 2014

/s/ Carol Zhang
Carol Zhang

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Weil, Gotshal & Manges LLP

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February 25, 2014

The Honorable Shelley C. Chapman
United States Bankruptcy Judge
United States Bankruptcy Court
Alexander Hamilton Customs House
One Bowling Green
New York, New York 10004

Re: In re Lehman Brothers Holdings Inc., et al. – Case No. 08-13555 (SCC)

Dear Judge Chapman:

I write regarding those certain omnibus objections to claims relating to Restricted Stock Units and Contingent Stock Awards, as to which an evidentiary hearing is scheduled to commence on April 1, 2014. A list of the affected omnibus objections is attached hereto.

The Court-approved procedures (the “Procedures”) regarding the upcoming evidentiary hearing [ECF No. 42176] permit LBHI to file separate memoranda in opposition to the opening memoranda of the Represented Participants, the Neuberger Berman Participants, and the Claimants who are not Represented Participants (as each of those terms is defined in the Procedures). Those opposition memoranda are limited to thirty pages, twenty pages, and ten pages (subject to enlargement), respectively. All together, the Procedures permit LBHI to file sixty pages of briefing in response to the various Claimants’ opening memoranda.

Upon review of the opening memoranda, LBHI believes that it will be able to streamline its responses and minimize the number of filings in this matter by submitting one consolidated opposition memorandum in response to the various opening memoranda filed by the various Claimants. This consolidated response will avoid duplication of arguments and efforts and will minimize the burdens on counsel, on the Claimants, and on the Court. LBHI expects that this memorandum will be less than fifty pages, but in no event, however, will it exceed sixty pages in total. In addition, LBHI will endeavor to clearly identify which portions of its memorandum respond to the various arguments made by the different individual Claimants and Claimant groups. Should the Court direct otherwise, LBHI will, of course, follow the Court’s instruction.

Respectfully submitted,



Ralph I. Miller

cc: RSU Claimants

Omnibus Objections Subject to the Evidentiary Hearing

1. Debtors' Fortieth Omnibus Objection to Claims (Late-Filed Claims) [ECF No. 11305]
2. Debtors' Seventy-Third Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 13295]
3. Debtors' One Hundred Eighteenth Omnibus Objection to Claims (to Reclassify Proofs of Claim as Equity Interests) [ECF No. 15666]
4. Debtors' One Hundred Thirtieth Omnibus Objection to Claims (to Reclassify Proofs of Claim as Equity Interests) [ECF No. 16115]
5. Debtors' One Hundred Thirty-First Omnibus Objection to Claims (to Reclassify Proofs of Claim as Equity Interests) [ECF No. 16116]
6. Debtors' One Hundred Thirty-Third Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 16530]
7. Debtors' One Hundred Thirty-Fourth Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 16532]
8. Debtors' One Hundred Thirty-Fifth Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 16808]
9. Debtors' One Hundred Seventy-Sixth Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 19392]
10. Debtors' One Hundred Seventy-Seventh Omnibus Objection to Claims (No Liability Non-Debtor Employee Claims) [ECF No. 19393]
11. Debtors' One Hundred Eighty-Fifth Omnibus Objection to Claims (Compound Claims) [ECF No. 19714]
12. Debtors' Two Hundred Seventh Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 20012]
13. Debtors' Two Hundred Fifty-Fourth Omnibus Objection to Claims (Employment-Related Claims) [ECF No. 25059]
14. Three Hundred Thirteenth Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 28433]
15. Three Hundred Fourteenth Omnibus Objection to Claims (Late-Filed Claims) [ECF No. 28435]
16. Three Hundred Nineteenth Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 28777]
17. Three Hundred Twenty-Ninth Omnibus Objection to Claims (Misclassified Claims) [ECF No. 29324]
18. Three Hundred Forty-Seventh Omnibus Objection to Claims (To Reclassify Proofs of Claim as Equity Interests) [ECF No. 30357]

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